Detrex
CHEMICALS DIVISION

February 13, 2009

Ms. Terese Van Donsel
United States Environmental Protection Agency
Office of Superfund, Region 5
SR-6J
77 West Jackson Blvd.
Chicago, IL 60604-3590

Certified Mail, Return Receipt: 7004 1160 0003 4669 0319

Subject: Monthly Status Report-January 2009
Fields Brook Superfund Site
Detrex Source Area-Ashtabula, Ohio

Dear Ms. Van Donsel,

Detrex is submitting the enclosed monthly status report for the month of January 2009, for the Detrex Source Area Project.

If you have any questions, please contact me at (440) 997-6131, ext. 201.

Sincerely,

Thomas W. Steib

Thomas W. Steib.
Operations Manager

cc: T. Doll, D. Church, R. Currie, J. Vence, K. Buell, URS, R. Williams, L. Evison

FIELDS BROOK SUPERFUND SITE, OPERABLE UNIT #2
DETREX SOURCE AREA
MONTHLY TECHNICAL STATUS REPORT

Project Phase: Remedial Design and Remedial Action.

Prepared by: Tom Steib of Detrex Corporation.

Period: Month of January 2009.

1. Progress Made This Reporting Period:

ACTIVITY	THIS PERIOD GALLONS	YEAR TO DATE GALLONS	TOTAL GALLONS
Estimated DNAPL Recovered	**-0- (Does not include volume in settling tank)**	**-0-**	**15,680**
DNAPL Disposed	**-0-**	**-0-**	**13,980**

A. There were -0- gallons of DNAPL pumped from the inside settling tank to the outside settling tank during January 2009.
B. Vacuum is at 20 inches.
C. Wells 1, 2, 4, 5, 6, 9, 10, 11, and 12 are being pumped on a regular basis.
D. Well 3, 7, and 8 are not pumpable and will be repaired.
E. Wells 13 and 14 do not pump.
F. All pumpable wells have to be flushed with water frequently to get the sediment out of the well insert to be able to pump.
G. Generating excessive amount of silt with the northern wells showing more silt than the east wells. Some of this silt causes difficulty in phase separation. Some of the silt settles to the bottom, while some silt gets caught in the rag layer between the DNAPL and the water, making the phase separation more difficult.
H. See attached report dated December 8, 2006, describing results of trenching along North Sewer in late 2006.

2. Work Planned During the Next 90 Days.

A. Continue re-developing the wells due to excessive silt build up.
B. All wells that are not pumpable will be attempted to be brought back on line.
C. Continue winterization.

URS

December 8, 2006

North Sewer Investigation
December 2006

Ms. Terese VanDonsel
United States Environmental Protection Agency
Office of Superfund, Region 5
SR-6J
77 West Jackson
Chicago, IL 60604-3590

Subject: Interim Response Action Work Scope
Detrex Source Control Area – Fields Brook Superfund Site
Detrex Corporation, Ashtabula, Ohio
Docket No. V-W-98-C-450

Dear Ms. VanDonsel:

On behalf of Detrex Corporation (Detrex), URS Corporation (URS) is providing this Interim Response Action (IRA) Work Scope to address the sheen that has been periodically observed in Fields Brook at the location of the former North Sewer discharge area. This letter also provides a summary of observations made during excavation of test trenches along the North Sewer alignment and discussion of proposed actions that Detrex will implement to address the sheen in this area.

Interim Response Action Work Scope

On Wednesday, December 6, 2006 Detrex, URS and personnel from U.S. EPA met on site to observe the excavation of the North Sewer test trenches and installation of the groundwater interceptor trench. On Tuesday, December 5, 2006, U.S. EPA observed a sheen emanating from beneath riprap located adjacent to the former North Sewer outfall. This former outfall has been plugged. During the day on Wednesday, December 6, 2006 a sheen was occasionally observed at this location. The sheen was not observed on a continuous basis. In response to this issue, and the request from the U.S. EPA, the following Interim Actions will be implemented.

Placement of Absorbent Boom

An oil absorbent boom was positioned on the north side of Fields Brook along the stream bank in the vicinity of the former North Sewer outfall where the sheen was observed. Approximately, 50 feet of boom material was secured to the State Road bridge and stream bank on Wednesday evening, December 6, 2006. It will be replaced on an as needed basis.

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Limited Excavation of Sediment in Fields Brook

Based on the results of excavating seven (7) test trenches along State Road, there is no field evidence to indicate that DNAPL is migrating beneath the abandoned sewer pipe. One of the test trenches (TP-5) excavated adjacent to the former North Sewer bulkhead in the floodplain indicated the presence of organic vapors and a sheen was observed on the water that entered the excavation. The location of the various test trenches is provided as **Figure 1**. Based on these results (described in later section), the area of impacted soil/sediment is located in the floodplain adjacent to former outfall of the North Sewer.

In order to address the source of the sheen, Detrex has agreed to perform a limited excavation of the sediment in this area. The following IRA work scope is proposed:

- Prior to excavation, Detrex will identify all utilities and secure a permit from Ashtabula County to work adjacent to the State Road bridge. The abandoned water line will be removed and East Ohio gas will be notified of work near the existing gas line.
- An access agreement is in place with Lyondell Chemical, and further notification will be made.
- A temporary coffer dam consisting of either steel barricades with a synthetic liner or synthetic fabridams will be placed adjacent to the area to contain surface water and control disturbed sediment during excavation.
- The excavation will be dewatered and any water collected will be transported to the Detrex facility for treatment. If DNAPL is encountered it will be placed in drums and transported to the Detrex facility for disposal.
- The area to be excavated will be restricted to the area immediately adjacent to the North Sewer bulkhead structure. An area approximately 15 feet x 10 feet will be considered for removal. The depth of excavation will not exceed 3 feet. Field observations will be used to define actual limits of excavation.
- The volume of excavated material will be limited to 40 cubic yards or two roll off containers.
- Excavation of the sediment will likely involve a small trackhoe along with hand excavation beneath the gas line.
- Workers will use the existing HASP that has been prepared for the North Sewer Investigation.

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- Upon completion of the prescribed excavation area, the excavation will be backfilled with clay and compacted. Any disturbed riprap in the area will be restored to original conditions.
- Upon completion of excavation, the excavated material stored in roll of boxes will be sampled and characterized to identify proper disposal options.
- A letter report will be prepared to describe field activities.

Preliminary Results of North Sewer Investigation

In accordance with the Work Plan that was submitted to U.S. EPA on July 26, 2006 and approved on October 25, 2006, field work was performed on December 5 and 6, 2006. **Figure 1** provides locations of the seven test trenches that were excavated and sampled. The following observations were made during this work:

- Test Trench 1:
  - North Sewer not encountered due to location of active gas line and depth. Test trench depth was approximately 10 feet. No elevated PID readings. No DNAPL.
- Test Trench 2:
  - North Sewer encountered. Test trench depth was approximately 10 feet. No elevated PID readings. No DNAPL. Water seepage noted along clay backfill near former North Sewer. No sheen on water.
- Test Trench 3:
  - North Sewer encountered. Test trench depth was approximately 10 feet. No elevated PID readings. No DNAPL. Water seepage along clay backfill near former North Sewer. No sheen on water.
- Test Trench 4:
  - North Sewer encountered. Test trench depth was approximately 10 feet. No elevated PID readings. No DNAPL. Water seepage along clay backfill near North Sewer. No sheen on water.
- Test Trench 5:
  - Based of bulkhead encountered. Test trench depth was approximately 10 feet. Elevated PID readings at depth of 6-8 feet below ground beneath fill (1,300 ppmv). Water seepage and sheen on water near base of bulkhead, sheen dissipated over time.

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- Test Trench 6:
  - North Sewer encountered. Test trench depth was approximately 6 feet. No elevated PID readings. No DNAPL. Water seepage along clay backfill near North Sewer. No sheen on water.
- Two (2) soil samples were collected from each excavation at highest PID and beneath the sewer pipe.

Based on these field observations, the North Sewer alignment area did not show presence of elevated PID readings in soil or DNAPL in the subsurface soils. As a result, the North Sewer does not represent a complete pathway for DNAPL migration to Fields Brook and EU-6.

During the excavation of these trenches, a representative of de maximis, Stan Baker, witnessed the excavation and results. Also, a request was made of Stan to furnish cut lines from the 2002 sediment remediation of the area to show what specific area was excavated.

Additional Subsurface Investigation

During a conversation with U.S. EPA on December 7, 2006, a request was made to Detrex to further investigate the North Sewer area. In particular, the area between State Road and the east side of the North Sewer, which could not be excavated due to the presence of utilities. In response to this request, Detrex will drill approximately 8-10 geoprobe locations along the alignment. Sampling procedures will be in accordance with the current RD/RA Work Plan. Two (2) locations will be installed as temporary groundwater monitoring wells. Utilities will be located prior to sampling. Figure 2 provides locations of the proposed geoprobe sampling location.

Schedule

At this time, Detrex anticipates the limited excavation work and additional geoprobe work will be conducted before December 22, 2006. Currently we are coordinating with Sun Pro to define work scope and plans for dewatering. As soon as all utility companies and Ashtabula County are notified and permit conditions are identified for working in the highway right-of-way, we will advise you of actual timing.

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If you have any questions regarding this submittal, please do not hesitate to contact me at your convenience.

Sincerely,

URS Corporation - Ohio

Martin L. Schmidt, Ph.D.
Vice President
Enclosure

cc: R. Currie – Detrex Corporation
T. Steib – Detrex Corporation
T. Doll - Detrex Corporation
T. Johnson – USEPA, Las Vegas
R. Williams – Ohio EPA
D. Gray – URS
F. Coll – URS

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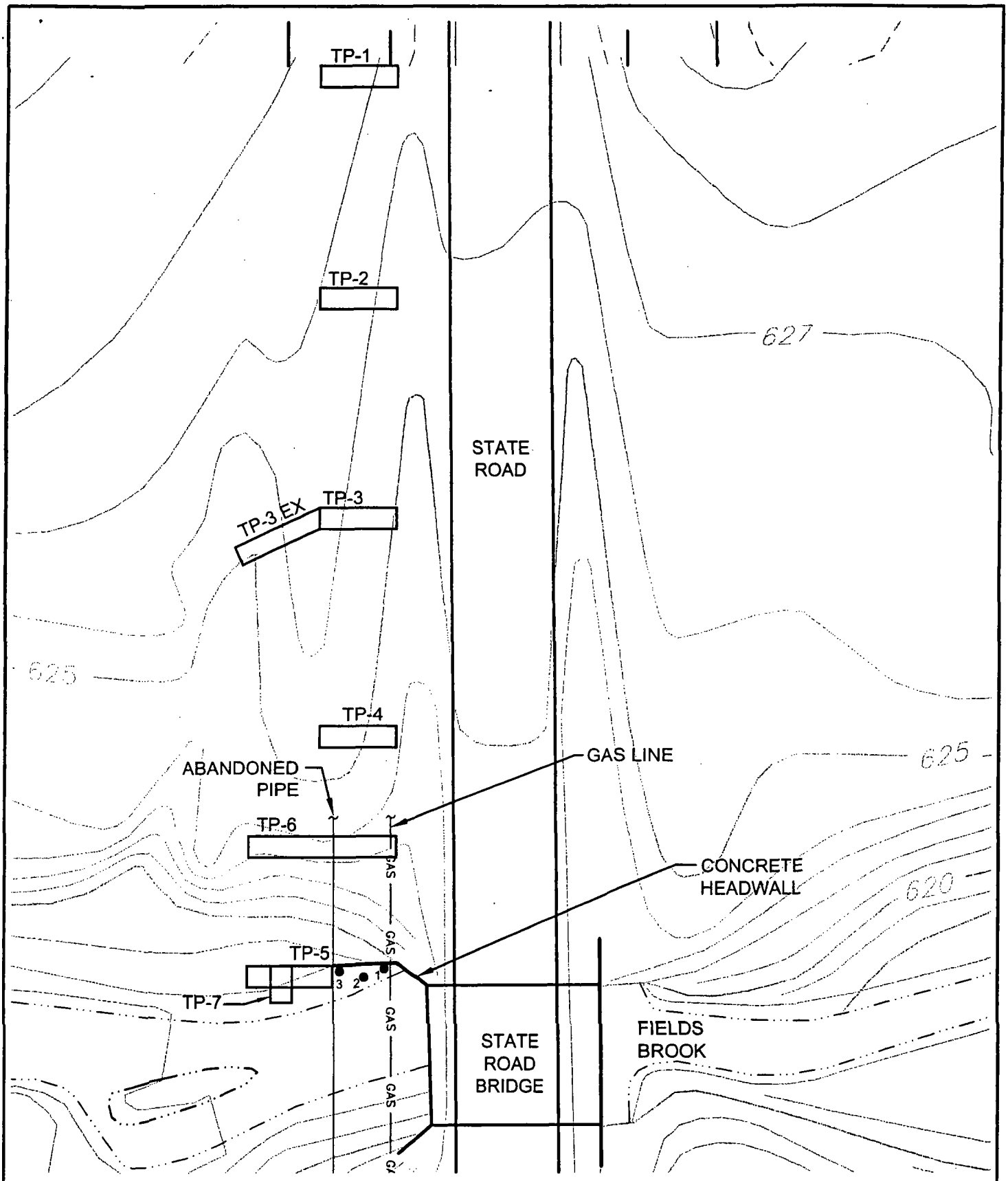

LEGEND

● SAMPLE POINT SS1

TP-3 TEST PIT #

0 30

SCALE 1" = 30'

N

DETREX CORPORATION

FIGURE 1
TEST PIT LOCATION MAP

URS

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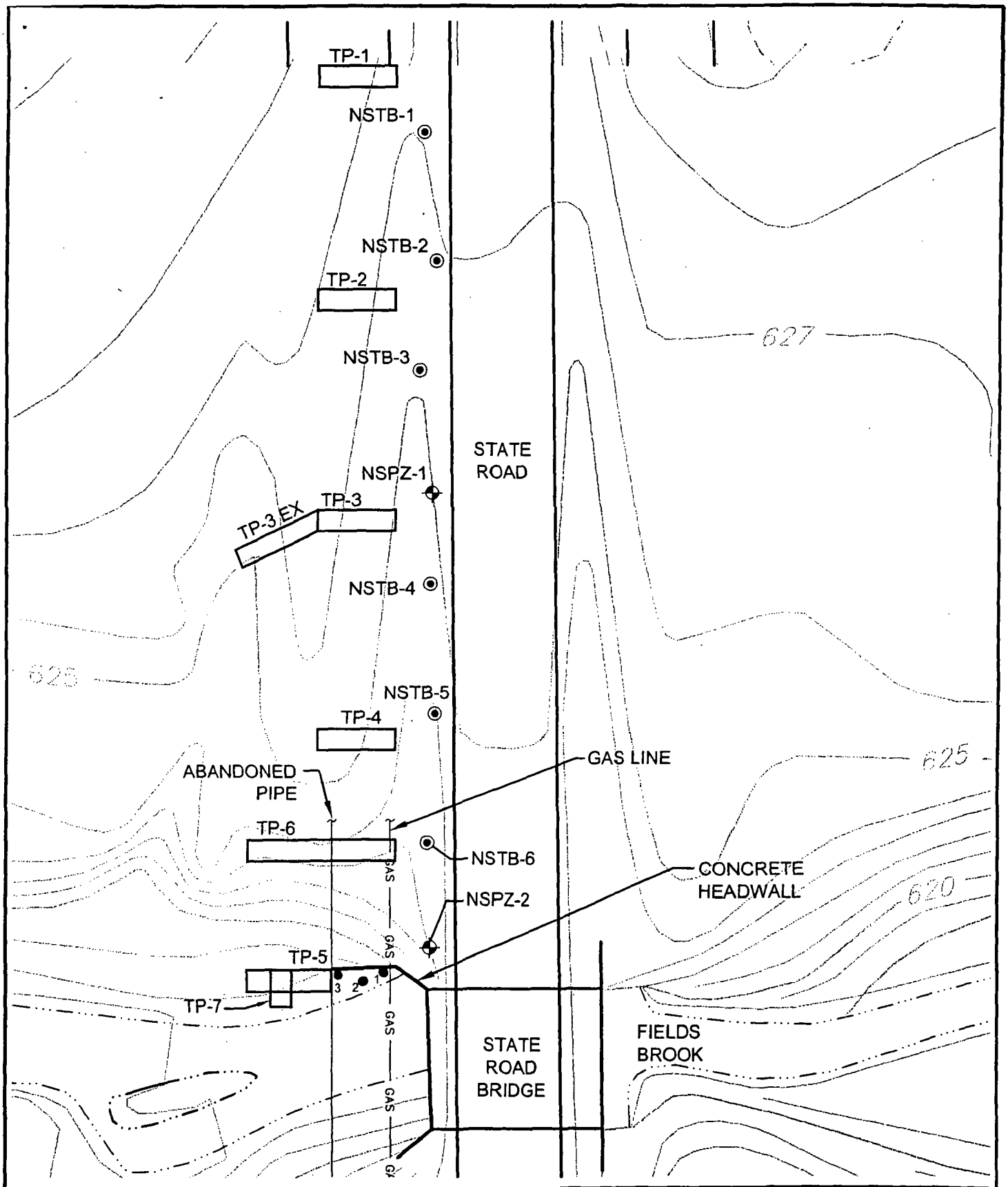

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